

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DEC - 3 2020

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEREMIAH COUCH, and
JOSHUA THOMAS

Defendants.

4:20CR00743 SEP/JMB

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about October 21, 2019, in the City of St. Louis, within the Eastern District of Missouri,

JEREMIAH COUCH,

the Defendant herein, with intent to cause death and serious bodily harm, took from the person and presence of another, by force, violence, and intimidation, a motor vehicle, that is, a 2007 Ford Edge, that had been transported in interstate commerce.

In violation of Title 18, United States Code, Sections 2119, and punishable under Title 18, United States Code, Section 2119(1).

COUNT TWO

The Grand Jury further charges that:

On or about October 21, 2019, in the City of St. Louis, within the Eastern District of Missouri,

JEREMIAH COUCH,

the Defendant herein, knowingly possessed and brandished a firearm in furtherance of a crime of violence which may be prosecuted in a Court of the United States, to wit: armed carjacking, as set forth in Count One of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT THREE

The Grand Jury further charges that:

On or about October 21, 2019, in the City of St. Louis, within the Eastern District of Missouri,

JEREMIAH COUCH,

the Defendant herein, knowingly possessed a firearm, knowing he had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year, and the firearm previously traveled in interstate or foreign commerce during or prior to being in defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1), and punishable under Title 18, United States Code, Section 924(a)(2).

COUNT FOUR

The Grand Jury further charges that:

On or about October 21, 2019, in the City of St. Louis, within the Eastern District of Missouri,

JOSHUA THOMAS,

the Defendant herein, knowingly possessed one or more firearms, knowing he had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year, and the firearms previously traveled in interstate or foreign commerce during or prior to

being in defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1), and punishable under Title 18, United States Code, Section 924(a)(2).

COUNT FIVE

The Grand Jury further charges that:

On or about October 21, 2019, in the City of St. Louis, within the Eastern District of Missouri,

JOSHUA THOMAS,

the Defendant herein, did knowingly and intentionally possess, with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance drug.

In violation of Title 21, United States Code Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT SIX

The Grand Jury further charges that:

On or about October 21, 2019, in the City of St. Louis, within the Eastern District of Missouri,

JOSHUA THOMAS,

the Defendant herein, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, to possess with the intent to distribute a controlled substance as set forth in Count Two.

In violation of Title 18, United States Code, Section 924(c)(1), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT SEVEN

The Grand Jury further charges that:

On or about October 19, 2019, in the City of St. Louis, within the Eastern District of Missouri,

JEREMIAH COUCH and JOSHUA THOMAS,

the Defendants herein, with intent to cause death and serious bodily harm, took from the person and presence of another, by force, violence, and intimidation, a motor vehicle, that is, a 2020 Jeep Cherokee, that had been transported in interstate commerce.

In violation of Title 18, United States Code, Sections 2 and 2119, and punishable under Title 18, United States Code, Section 2119(1).

COUNT EIGHT

The Grand Jury further charges that:

On or about October 19, 2019, in the City of St. Louis, within the Eastern District of Missouri,

JEREMIAH COUCH and JOSHUA THOMAS,

the Defendants herein, knowingly possessed and brandished a firearm in furtherance of a crime of violence which may be prosecuted in a Court of the United States, to wit: armed carjacking, as set forth in Count One of this Indictment.

In violation of Title 18, United States Code, Sections 2 and 924(c)(1), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT NINE

The Grand Jury further charges that:

On or about October 17, 2019 up to and including October 21, 2019, in the City of St. Louis, within the Eastern District of Missouri,

JEREMIAH COUCH and JOSHUA THOMAS,

the Defendants herein, knowingly possessed a stolen firearm, which had been shipped and transported in interstate or foreign commerce, knowing and having reasonable cause to believe the firearm was stolen.

In violation of Title 18, United States Code, Sections 2 and 922(j), and punishable under Title 18, United States Code, Section 924(a)(2).

COUNT TEN

The Grand Jury further charges that:

On or about September 30, 2019, in the City of St. Louis, within the Eastern District of Missouri,

JOSHUA THOMAS,

the Defendant herein, knowingly possessed ammunition, knowing he had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year, and the ammunition previously traveled in interstate or foreign commerce during or prior to being in the Defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1), and punishable under Title 18, United States Code, Section 924(a)(2).

A TRUE BILL

FOREPERSON

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